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11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

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15 HOOPA VALLEY TRIBE,  
16 Plaintiff,

17 v.

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19 UNITED STATES BUREAU OF  
20 RECLAMATION, et al.

21 Defendants.

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25 Case No. 1:20-cv-01814-DAD-EPG

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27 **DECLARATION OF LISA M. HOLM IN**  
**SUPPORT OF FEDERAL**  
**DEFENDANTS' MOTION TO**  
**CONSOLIDATE**

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**DECLARATION**

I, Lisa M. Holm, declare as follows:

1. I submit this declaration in support of the Federal Defendants' Motion to Consolidate.  
the following facts are within my personal knowledge.

- 1       2. I am employed as a Supervisory Repayment Specialist with the U.S. Bureau of
- 2       Reclamation (Reclamation) in the Department of the Interior, with an educational
- 3       background in Mechanical and Environmental Engineering. I have been employed by
- 4       Reclamation since 2008. My current responsibilities include supervision of the water
- 5       rights and water supply contracting staff. In October 2019 I took over functional
- 6       responsibility for program-level management of the Water Infrastructure Improvements
- 7       for the Nation Act (WIIN) contract conversions within the Central Valley Project.
- 8
- 9       3. As the program manager of the WIIN Act contract conversions within the Central Valley
- 10      Project (“CVP”), I review for accuracy and completeness all contracts before they are
- 11      executed by the Regional Director of the California-Great Basin Region and I track the
- 12      status of all potential and completed contracts.
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- 14      4. At this time, Reclamation has CVP-related contracts with 234 local water contractors.
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- 16      5. Of those, approximately 200 contractors hold contracts that potentially qualify for
- 17      conversion, and approximately 80 have requested that their contracts be converted
- 18      pursuant to the WIIN Act.
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- 20      6. To date, Reclamation has converted 68 contracts pursuant to the WIIN Act and 22
- 21      contracts are in the process of being converted.
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- 23      7. Approximately 120 contractors have water service contracts or renewable term repayment
- 24      contracts and have not requested conversion pursuant to the WIIN Act.
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- 26      8. Having managed the conversion of these contracts, I can state that these contract
- 27      conversions modify the terms of repayment of long-term capital construction costs related
- 28      to the CVP. Namely, conversion contracts accelerate repayment of CVP-related  
          construction costs from the original due date of 2030 pursuant to the provisions of §

1 4011(a)(2) of the WIIN Act. Depending on the particular conversion contract, repayment  
2 now ranges from immediate repayment to, at the latest, repayment by 2023.

3 9. The conversion contracts do not alter the *status quo* as to water delivery and therefore do  
4 not affect water levels. In other words, the quantities of water to be delivered and the  
5 timing of those deliveries are unaffected by the contract conversions.

6 10. The converted contracts, just like the prior contracts, condition water delivery on the  
7 Federal Defendants' ability to comply with federal reclamation law.

8 I declare under penalty of perjury that the foregoing information is true and correct.

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10 Executed this 24th day of May 2021, in Sacramento, California.

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13 Lisa M Holm, PE  
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